

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION**

Keyuna Cameron
Plaintiff

vs.

Southwest Tennessee Community College

Civil Action #: _____

Defendant

JURY DEMANDED

COMPLAINT

1. COMES NOW, Plaintiff and brings this action against her former employer for employment discrimination for racial discrimination, in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. {2000e-16 and 29 C.F.R. {1614.101 (a) .Jurisdiction is specifically conferred on the court by 42 U.S.C.} 2000e-5. Equitable and other relief are also sought under 42 U.S. C. {2000e-5(g).
2. Plaintiff, **Kenyna** Cameron is, an African American female and a citizen of the United States and resides at 7277 Shady Oaks Drive, Bartlett, Tennessee 38133.
3. Defendant's Corporate Headquarters is listed as 5983 Macon Cove, Memphis, Tennessee 38134 at with at least one additional office located at 737 Union Ave, Memphis, Tennessee, 38103.

4. Plaintiff was employed by the defendant in its Memphis location.
5. Defendant unlawfully discriminated against plaintiff in the manner indicated in paragraphs 9 and 10 of the complaint that resulted in Plaintiff being subjected to unjust, unmerited, unwarranted and unlawful discriminatory employment and personnel decisions that created adverse employment determinations
6. Plaintiff filed timely charges against the Defendant when she filed with the US EEOC Case # 490-2015-02343.
7. The EEOC issued a Right to Sue notice on March 23, 2017 **EXHIBIT # 1** Plaintiff received her notice five days after the stamped mail date, listed as March 29 2017.
8. Because of plaintiff's (1) ☒ Race, (2) ☐ color, (3) ☐ sex, ☐ religion, (5) ☐ national origin (6) ☐ (7) ☐ Disability; ☐ Age; (8) ☐ Retaliation , Defendant:
 - (a) ☐ failed to employ plaintiff.
 - (b) ☒ terminated plaintiff's employment.
 - (c) ☐ failed to promote Plaintiff to a promotional opportunity.
 - (e) ☒ subjected Plaintiff to unlawful discrimination
9. The circumstances under which the defendant discriminated against plaintiff are as follows: (all supportive documents referenced in paragraph 9 are all found in **Collective Exhibit #2:**
 1. Plaintiff was hired by Defendant in August 2015.
 2. Plaintiff was hired in the position of Professor.

3. Specifically, Plaintiff was hired as an Instructor to Biotechnology students
4. Plaintiff also taught other Natural Science courses.
5. Plaintiff served as advisor to students.
6. Plaintiff kept posted office hours.
7. Plaintiff attended required meeting.
8. Plaintiff attended graduation.
9. Plaintiff was hired and accepted a salary of \$ 32,000 + Summer/Overload- \$60,000 annual.
10. Plaintiff was terminated on August 2016.
11. Plaintiff 's compensation at the time of her termination was \$ 32,000 + Summer/Overload- \$60,000 annual.
12. Plaintiff was denied overload classes to supplement her salary in September 2014.
13. Defendant's employee Marjorie Rothschild, a white female was hired as new professor like Plaintiff was.
14. Defendant's employee Marjorie Rothschild, a white female was given overload classes.
15. Defendant's employee Marjorie Rothschild, a white female was not denied overload classes.
16. Defendant's employee and Plaintiff's immediate Supervisor, Robert Blaudow, Department Chair's only explanation for Defendant's adverse employment action was because he felt , Plaintiff would have too much responsibility based on the opinion of Amy Waddell being a new full-time professor.

17. Defendant's Fall 2015 schedule evidences and substantiates Plaintiff's allegation of being subjected to unlawful discriminatory employment practices that was based upon her status of being an African American.
18. Defendant's termination of Plaintiff was the adverse employment determination that altered the terms and condition of her employment.
19. Defendants employee, Amy Waddell, a white female White females, constantly interfered with Plaintiff's classes during the semesters.
20. Defendants employee, Julie Waits, a white female White females,
21. constantly interfered with Plaintiff's classes during the semesters.
22. Defendant's employee and Plaintiff's immediate Supervisor, Robert Blaudow, Department Chair, disclosed that Plaintiff was working in the most difficult program within the department because Julie Waits and Amy Waddell wanted to just give grades to students and micromanage everyone despite her inability and lack of understanding of the subject matter.
23. Defendant's employee and Plaintiff's immediate Supervisor, Robert Blaudow, Department Chair, disclosed that Plaintiff was working in the most difficult program within the department because Amy Waddell wanted to just give grades to students and micromanage everyone despite her inability and lack of understanding of the subject matter.
24. Defendant's professor, Ken Carpenter, expressed that he was subject to the same abuse once he started as an African American professor.
25. On October 2014 Plaintiff asked to design a new course relevant to the curriculum for the Biotechnology Department.

26. During orientation, Defendant's new hires which included Plaintiff were informed that they could design new courses that were not available after speaking with the department chair, Rob Blaudow.
27. Defendant stated to Plaintiff that the person responsible for designing the course would also be compensated.
28. Plaintiff spoke directly with Defendant's employee, Rob Blaudow, Department Chair, about designing a scientific writing class that would benefit the students.
29. Defendant's employee, Bandow told Plaintiff that he would speak to the Dean.
30. Plaintiff inquired about the course later and was informed that she should take a tally based on student interests.
31. Plaintiff informed told Defendant's employee, Rob Blaudow, Department Chair that students had already expressed interest in the course because she had spoke to them.
32. Since Defendant's students lacked skills required in a laboratory setting. Defendant's employee, Rob Blaudow, Department Chair, informed Plaintiff that he would get back with her later concerning the course.
33. During Plaintiff's interview, she learned that Defendant's employee, Rob Blaudow, Department Chair had given her idea and new course design to Defendant's employee Julie Waits, white female.
34. Defendant's employee, Rob Blaudow, Department Chair gave employee Julie Waits her idea so that she could benefit from the new course.
35. Plaintiff has evidence of how African Americans are not afforded the same opportunity as whites despite having novel ideas to serve in their position

36. Plaintiff has evidence of how African Americans responsibilities are given to the white employees in the department for them to progress.
37. On May 2015, Plaintiff interviewed for a Full-time Assistant Professor.
38. Defendant made transparent actions specifically by the hiring committee to hire white female in Plaintiff's position.
39. On the day of the interview, Defendant's employee and Plaintiff's immediate Supervisor, Robert Blaudow, asked white female employee Julie Waits, " If she had contacted the rest of committee for the interview?
40. Defendant's employee Waits, stated that she would text employee Rosie Taylor, Black female committee member to inform her of Plaintiff's interview.
41. Plaintiff found out later that Defendant's employee Julie did not inform Rosie about the interview.
42. Defendant's employee Waits, only texted Rosie that coffee and doughnuts were available, but never informed her about the interview.
43. Defendant deliberately and intentionally excluded only black committee member to unanimously vote for white female favorite candidates. Defendant's employee, Marjorie Rothschild, White Female, not only received overload Classes, she was also rehired as Assistant Professor .
45. Defendant's employee Amanda Banker, White Female, received immediate rehire following her temporary hire of Assistant Professor .
46. Defendant's employee Ziba Hoosdaran, white Female, was rehired following temporary hire as Assistant Professor

47. Defendant's African American employee, Ken Carpenter, Black Male Associate Professor can substantiate Plaintiff's assertions of racial discrimination.

44. Defendant's employee Rosie Taylor, African American Female Associate Professor, can attest to Plaintiff's allegations.

10. The acts set forth in paragraphs 9 of this complaint:

- (a) ___ are still being committed by defendant.
- (b) ___ are no longer being committed by defendant.
- (c) ___ **X** ___ may still be being committed by defendant.

11. Plaintiff attaches to this complaint a copy of the charges (formal Complaint) .

WHEREFORE, Plaintiff prays that the following relief be granted following a jury in her favor:

- (a) ___ Defendant be directed to employ plaintiff,
- (b) ___ **X** ___ Defendant be directed to re-employ plaintiff,
- (c) ___ Defendant be directed to promote plaintiff
- (d) **X** ___ **Defendant** be directed to pay:

1.) Compensatory damages against Defendant in an amount to be determined by the jury but not less than three hundred thousand dollars \$300,000; 2) Any and all other pecuniary losses proximately caused by Defendant's unlawful conduct; 3.) Punitive damages against Defendant in an amount of twelve (1) million dollars or a punitive amount to be determined by the jury if the Jury finds the Defendant engaged in intentional, malicious and reckless acts of discrimination without regard to Plaintiff professional character,

integrity and documented skill set 4.) All costs, disbursements, pre-judgment interest, post-judgment interest, expert witness fees and reasonable attorneys' fees allowed under actions brought pursuant to 42 U.S.C. § 1981; 5) Such further relief as is deemed just and proper and appropriate including injunctive relief.

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Plaintiff Signature

Printed Name Keyuna Cameron

Plaintiff Address 1277 Shady Oaks Drive

Plaintiff Phone 901-530-7475

DATE: 29 June 2017